



EPA Region 5 Records Ctr.



317119

August 10, 2008

Dr. Leah Evison  
U. S. EPA - Region 5 (SR-6J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

**Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)  
Monthly Report July 1 – July 31, 2008**

Dear Dr. Evison:

Enclosed is the Sauget Sites Area I Monthly Report for the July 2008 reporting period. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven D. Smith". The signature is fluid and stylized, with the first and last names being more prominent.

Steven D. Smith  
Project Coordinator

**cc:** Kevin Turner – USEPA  
Tim Gouger - USACE  
Sandra Bron - IEPA  
Dave Webb - IDPH  
Mike Coffey - USF&W  
Richard Williams - Solutia  
Cathleen Bumb - Solutia  
Mayor Frank Bergman - Cahokia, IL  
Village of Sauget - c/o P. H. Weis & Associates (Attn: Brian Nelson)  
Mayor R. Sauget - Sauget, IL  
L. Glen Kurowski - Monsanto  
Linda Tape - Husch Blackwell Sanders, LLP

## **Sauget Sites Area I - Sauget, Illinois**

### **AOC - EECA / RIFS**

#### **Status Report**

**Date of Report:** August 10, 2008  
**Period Covered:** July 1, 2008 - July 31, 2008

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#### **Work Performed during the Reporting Period**

Samples in the utility corridors along Queeny Avenue between Sites H and I were obtained on June 7<sup>th</sup>, 2007 in accordance with the requirements of the Work Plan approved on March 22<sup>nd</sup>, 2007. The validated analytical results from these samples were submitted to the Agency on January 3<sup>rd</sup>, 2008. Comments on this report were received from the Agency on February 12<sup>th</sup> and a revised report was submitted on March 19, 2008. The revised report was approved on July 2, 2008, although the Agency noted that it would place an errata sheet with the report in the record.

A final Work Plan that incorporated all of the approved revisions to the section dealing with the methodology for carrying out the Human Health Risk Assessment (HHRA) was approved by the Agency on April 10, 2008.. A comprehensive final Work Plan that incorporates both portions of the Work Plan (the sampling and analysis Plan and the HHRA Plan) is being prepared and will be submitted to the Agency in August. The risk assessment that took account of these approved changes was previously submitted on February 28, 2008. Comments on this report were received on July 2<sup>nd</sup> and responses to these comments were submitted to the Agency on July 11<sup>th</sup>.

The final Work Plan for the Soil Vapor Intrusion Investigation was approved on May 24<sup>th</sup>, 2007. USEPA issued comments on a Technical Memorandum summarizing the results of a human health evaluation submitted to the Agency on March 19<sup>th</sup>, 2007. These comments are dated June 8<sup>th</sup>, 2007. However, they were not received at that time by the Project Coordinator and the comments were reissued on September 20<sup>th</sup>, 2007. A teleconference was held with the Agency and its oversight contractor, CH2M Hill, on October 23<sup>rd</sup>, 2007 and responses to those comments were submitted to the Agency on January 2, 2008. The human health evaluation was submitted on January 4, 2008.

A report summarizing the results of DNAPL recovery pumping tests at BR-I was submitted to the Agency on April 16, 2007. Comments on the report were received from the Agency on January 23, 2008. Responses to those comments and a revised report were submitted to the Agency on March 4, 2008. The responses and revised report were approved by the Agency on June 16<sup>th</sup>. At that time, the Agency requested that recovery

of DNAPL at BR-I begin as soon as possible. Modifications to the recovery system were expedited and it is now expected to be operational in August.

USEPA is also reviewing a Technical Memorandum documenting the derivation of risk-based concentrations used in the Dead Creek removal work and in the Dead Creek Ecological Risk Assessment submitted to the Agencies on July 27<sup>th</sup>, 2007.

On February 5<sup>th</sup>, comments were received from the Agency on a Tech Memo on Principal Threat Evaluation for Toxicity that was submitted in January 2006. Those comments were reviewed and responses were submitted on June 2<sup>nd</sup>.

The following items that were discussed during a May 24, 2007 teleconference with USEPA and CH2M Hill remain outstanding:

- The status of the Technical Memorandum presenting the results of the Human Health Risk Assessment for a residential child exposure in Dead Creek. This Tech Memo was submitted to the Agencies in April 2006.
- Agency comments on the proposed changes to the draft RI report.

### **Attachments**

There are no Technical Memoranda or data submitted with this report.

### **Work Scheduled for Next Reporting Period**

- Install the equipment necessary to permit the biweekly removal of DNAPL from BR-I pursuant to a request from USEPA and begin to extract DNAPL.
- Submit the approved final Work Plan for the Queeny Avenue Utility Corridor investigation.